

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

ANTHONY SMITH,)	
)	
Plaintiff,)	
)	
v.)	Case No. 6:20-cv-00016-NKM
)	
CENTRA HEALTH, INC., et al.,)	
)	
Defendants.)	

DEFENDANT CENTRA HEALTH, INC.'S MOTION TO DISMISS COMPLAINT

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant Centra Health Inc. ("Centra") moves the Court to dismiss with prejudice the Complaint filed by Plaintiff Anthony Smith ("Plaintiff"). As set forth in Centra's Memorandum in Support of its Motion to Dismiss, Plaintiff's Complaint fails to state a claim on which relief can be granted.

Centra requests that the Court dismiss Plaintiff's Complaint with prejudice and award Centra such other and further relief as may be just and proper.

Dated: March 27, 2020

Respectfully submitted,

CENTRA HEALTH, INC.

By: /s/ Joshua F. P. Long
Of Counsel

Elizabeth Guilbert Perrow, Esq. (VSB No. 42820)
Daniel T. Sarrell, Esq. (VSB No. 77707)
Joshua F. P. Long, Esq. (VSB No. 65684)
Joshua R. Treece, Esq. (VSB No. 79149)
J. Walton Milam III, Esq. (VSB No. 89406)
WOODS ROGERS PLC
P. O. Box 14125
Roanoke, VA 24038-4125
Phone: (540) 983-7600

Fax: (540) 983-7711
eperrow@woodsrogers.com
dsarrell@woodsrogers.com
jlong@woodsrogers.com
jtreece@woodsrogers.com
wmlam@woodsrogers.com

Counsel for Defendant Centra Health, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of March, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notice to the following counsel of record:

M. Paul Valois, Esq.
JAMES RIVER LEGAL ASSOCIATES
7601 Timberlake Road
Lynchburg, VA 24502
Phone: 434-845-4529
Fax: 434-845-8536
mvalois@vbclegal.com

Counsel for Plaintiff Anthony Smith

/s/ Joshua F. P. Long_____.